

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

VISA INC.,

Defendant.

Case No. 1:24-cv-07214-JGK-SLC

Oral Argument Requested

MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, supporting declaration, the exhibits annexed thereto, and all other papers and proceedings herein, Defendant now moves this Court, before the Hon. John G. Koeltl, United States District Judge, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing Plaintiff's Complaint (ECF No. 1) in its entirety.

DATED: December 16, 2024

Respectfully submitted,

/s/ Beth A. Wilkinson

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